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Attorneys for Proposed Lead Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
CHRIS BASNETT, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiffs,

-against-

LONGWEI PETROLEUM HOLDING
LIMITED, CAI YOUNGJUN, JAMES
CRANE, AND MICHAEL TOUPS

Defendants.

----- X
JUN MA, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

-against-

LONGWEI PETROLEUM HOLDING
LIMITED, CAI YONGJUN, JAMES
CRANE, AND MICHAEL TOUPS

Defendants.

----- X

Case No 13 cv 214 (HB)
**MOTION OF RICHARD D. KOZMA FOR
APPOINTMENT AS LEAD PLAINTIFF,
APPOINTMENT OF LEAD COUNSEL,
AND CONSOLIDATION OF RELATED
ACTIONS**

Case No 13 cv 229 (JPO)

----- X
CHARLIE MUNIZ, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS Case No 13 cv 278 (HB)
SIMILARLY SITUATED,

Plaintiffs,

-against-

LONGWEI PETROLEUM HOLDING
LIMITED, CAI YONGJUN, JAMES
CRANE, AND MICHAEL TOUPS

Defendants.

----- X
PAUL HOWARD, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED, Case No 13 cv 422 (HB)

Plaintiffs,

-against-

LONGWEI PETROLEUM INVESTMENT
HOLDING LIMITED, CAI YONJUN,
JAMES CRANE, AND MICHAEL TOUPS,

Defendants.

----- X

**MOTION OF RICHARD D. KOZMA FOR APPOINTMENT AS LEAD PLAINTIFF,
APPOINTMENT OF LEAD COUNSEL, AND CONSOLIDATION OF RELATED
ACTIONS**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT Richard D. Kozma (“Movant”) respectfully moves this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), for entry of an Order: (i) appointing Movant as Lead Plaintiff on behalf of himself and all others similarly situated who purchased Longwei Petroleum Investment Holding Limited (“Longwei” or the “Company”) securities between May 17, 2010 and January

3, 2013, inclusive (the “Class Period”); (ii) appointing the law firm of Cohen Milstein Sellers & Toll PLLC (“Cohen Milstein”) to serve as Lead Counsel; and (iii) consolidating the related actions.

This motion is supported by the accompanying Memorandum of Law, the Declaration of S. Douglas Bunch, and the exhibits annexed thereto, all of the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Movant respectfully requests that the Court: (i) appoint Movant as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Exchange Act; (ii) appoint Cohen Milstein as Lead Counsel for the class; (iii) consolidate all related actions; and (iv) grant such other and further relief as the Court may deem just and proper.

March 5, 2013

Respectfully submitted,

s/ Michael Eiskenkraft

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